# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

In re: \* Case No. 18-50882

Kevin Nourse

\* Ch. 13

Amy Nourse

Debtor(s) \* Judge: PRESTON

## OBJECTION TO CLAIM 8 OF NATIONSTAR MORTGAGE LLC DBA MR. COOPER

Now come the debtors, by and through counsel, to object to the following Claim:

Name of Claimant: NATIONSTAR MORTGAGE LLC DBA MR. COOPER ("Creditor")

**Date Filed:** March 27, 2018

Claim #: 8

**Amount of Claim**: \$205, 936.80 with \$2,774.98 in mortgage arrears

**Alleged Basis of Claim:** secured by the debtors' residence

**Grounds for Objection to Claim #8:** the debtors were current on payments as of the date of the petition for relief and submit that the projected escrow deficiency did not exist as of the petition date.

**Request for relief or treatment of the claim:** disallowed as filed and allowed for \$205,415.81 with no arrears.

WHEREFORE, the debtor respectfully requests that the Court enter an order sustaining the debtor's objection.

Respectfully submitted,

/s/ Michael A. Cox Michael A. Cox (0075218) Guerrieri Cox & Associates 2500 N. High Street, Suite 100 Columbus, Ohio 43202 614.267.2871

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Attorney for Debtor(s)

#### NOTICE OF OBJECTION TO CLAIM AND CERTIFICATE OF SERVICE

The above named debtor, by and through counsel, has filed an objection to your claim in this bankruptcy case.

Your claim may be reduced, modified, or eliminated. You should read these papers carefully and discuss them with your attorney, if you have one.

If you do not want the court to eliminate or change your claim, then on or before thirty (30) days after the date this notice was sent (set forth below) you or your lawyer must file a response with the U.S. Bankruptcy Court and serve the response upon counsel for the Debtors (address set forth below). Any response shall state clearly in its caption the objection to which it is responding.

The address for the Court is: U.S. Bankruptcy Court

170 N. High Street

Columbus, Ohio 43215-2403

If you fail to timely respond to the Objection to your claim, then the Court may decide that you do not oppose the objection to your claim.

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that copy of the foregoing Objection and Notice of Objection was served upon the Trustee and U.S. Trustee electronically and by ordinary mail upon the debtor(s) and the following parties in interest on Wednesday, May 02, 2018:

All ECF participants registered in this case were served electronically on the date of filing through the court's ECF System at the email address registered with the court.

And, the following Parties in Interest were served via U.S. Mail:

Kevin Nourse Amy Nourse 350 Vista Ridge Dr. Delaware, OH 43015

### NATIONSTAR MORTGAGE LLC DBA MR. COOPER

Nationstar Mortgage LLC d/b/a Mr. Cooper Attn: Bankruptcy Dept. P.O. Box 619096 Dallas, TX 75261-9741

> /s/ Michael A. Cox Michael A. Cox (0075218)